IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

PARALLEL IRON, LLC,	
Plaintiff,	
v.	C. A. No. 11-799-HB
ADCONION MEDIA, INC., et al.,	
Defendants.	
STIPULATION AND [PROPOSED] ORDER OF DISMISSAL	
IT IS HEREBY STIPULATED, subject to the approval of the Court, that pursuant to	
Rule 41(a)(2) of the Federal Rules of Civil Procedure, Plaintiff Parallel Iron, LLC hereby	
stipulates and agrees to the dismissal, with prejudice, of all claims in the above action against	
Defendant GroupOn Inc. The parties shall bear their own costs and attorneys' fees.	
BAYARD, P.A.	MORRIS JAMES LLP
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Attorneys for Plaintiff Parallel Iron, LLC	
November 11, 2011	
IT IS SO ORDERED this day of	, 2011
United States District Indge	